

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:24MJ9165 RHH
)
BOWEN CHEN,)
)
Defendant.)

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Tracy Lynn Berry, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with in the following criminal offenses: conspiracy to commit bank and wire fraud, 18 U.S.C. § 1349; wire fraud, 18 U.S.C. § 1343; money laundering, 18 U.S.C. § 1956; and engaging in an unlicensed money transmitting business, 18 U.S.C. § 1960.
2. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against Defendant and Defendant's history and characteristics warrant Defendant's detention pending trial.

The defendant entered the United States on a tourist visa from China in 2016. Subsequently, his status in the United States was adjusted to a lawful permanent resident alien.

The fraud scheme underlying the complaint involves the laundering of fraud proceeds and the proceeds of other illegal conduct by Defendant and other individuals by converting the illegal proceeds into cashier's checks before depositing them into the bank accounts of others. Defendant began engaging in the fraudulent transactions after he was recruited by another member of the money laundering organization ("MLO") on a date prior to January 24, 2022. Between January 24, 2022 and August 9, 2023, Defendant engaged in more than \$9,000,000 in cash in-currency transactions throughout the United States and deposited approximately \$1,300,000 in fraudulently obtained cashier's checks into a single financial account. The transactions were conducted in more than six states and involved at least four federally insured financial institutions.

In addition to his own transactions, Defendant recruited Jiacheng Chen to assist him in converting the illegal proceeds into cashier's checks and depositing the checks into the bank accounts of others. Between August 2, 2022 and July 31, 2023, Jiacheng Chen conducted more than \$2,600,000 cash transactions in seven states and deposited approximately \$425,000 into a single bank account while working with Defendant in the Eastern District of Missouri.

3. There is a serious risk that the defendant will flee because he is a citizen of China and has connections in China. Defendant also has ties to Mexico as a result of his involvement in the MLO. The United States also submits that Defendant poses a risk of flight as members of the MLO have received and used Taiwanese passports that had been lawfully issued to others in the course of their money laundering activities.

Finally, the Government notes that because of the amount of currency transactions Defendant conducted or assisted Jiacheng Chen in conducting and his role in the offense, Defendant faces a significant sentence if convicted. Because he is not a United States citizen, the Government notes that he could be deported after the conclusion of his sentence. The Government

submits that these factors could provide an incentive for the Defendant to flee the United States and avoid criminal prosecution.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and ensure that he does not pose a risk of economic danger to the community, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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